

Marathon Petroleum Company LP

1300 South Fort Street Detroit, MI 48217 Telephone 313/843-9100

VIA FEDERAL EXPRESS

April 13, 2011

Ms. Teresa Seidel Michigan DNRE – Air Quality Division 3058 West Grand Blvd. Suite 2-300 Detroit, MI 48202



Re: Continuous Emissions Monitoring System Reports for the First Quarter 2011; Marathon Petroleum Company LP – Michigan Refining Division

Dear Ms. Seidel:

This report contains information and data related to continuous emissions monitoring systems (CEMS) at Marathon Petroleum Company LP's (MPC's) Michigan Refining Division (MRD) for the first quarter 2011. These reports are submitted pursuant to the General Provisions of the federal New Source Performance Standards (40 CFR 60.7) and Rule 1170 of the Michigan Air Pollution Control Rules. In addition, this report contains information required by the first modification to the November 2005 First Revised NSR Consent Decree, United States of America et. al. v. Marathon Petroleum Company LLC (Civil Action No. 4:01CV-40119-PVG), lodged February 7, 2008 and entered on March 31, 2008. This report is divided into three attachments as follows:

Appendix A – CEMS downtime and excess emissions summary reports pursuant to 40 CFR 60.7(d) for all environmental analyzers at the Refinery. The CEMS did not exceed the downtime limit of 5% or the excess emission limit of 1%.

Appendix B - New Source Performance Standards (NSPS) Subpart J Alternate Monitoring Plan (AMP) data for seven streams: (1) Alky Spent Caustic H2S, (2) CCR/SR Recycle H2 H2S, (3) DHT/Unifiner Recycle H2 H2S, (4) FCCU Disulfide off-gas H2S, (5) CP Spent Caustic Drum Vent H2S, (6) SR Aromatics Sump Vent H2S, and (7) CCR Chlorsorb Vent SO2.

The Refinery has five additional AMPs for which no data is being submitted: (1) The Crude Spent Caustic Drum was permanently shutdown, (2) The BT Recycle Hydrogen, which was part of the BT Platformer unit, was permanently shutdown in September 2005, (3) CCR Lockhopper Vent Gas which currently cannot physically be vented to the flare or fuel system, (4) Propylene Deethanizer off-gas and (5) Alky Deethanizer off-gas were re-routed to a location that the refinery's fuel gas H2S analyzer will receive the streams.

All AMPs were obtained in accordance with the NSPS General Provisions (40 CFR §60.13(i)).

Appendix C – Data from cylinder gas audits performed on CEMS located on the exhaust of the B&W Boiler, Crude and Vacuum Heaters, CCR Charge Heater, Sulfur Plant Thermal Oxidizer, West Plant H2S, FCC Charge Heater, and the Zurn Boiler.

A Relative Accuracy Test Audit (RATA) was conducted on the East Plant H2S CEMS the week of January 18, 2011. Additionally, the Fluid Catalytic Cracking Unit (FCCU) Regenerator NOx and SO2 CEMS were re-ranged from 0-1000 ppm to 0-200 ppm in order to obtain more accurate data where the process normally runs and fulfills the requirements of NSPS Subpart Ja which will be applicable following the DHOUP expansion. Due to the re-range a RATA was conducted on the FCCU Regenerator CEMS and the 7-day calibration drift test was completed the week of March 11, 2011. The details of the FCCU Regenerator CEMS and the East Plant H2S CEMS RATAs and calibration drift information will be submitted separately; specifically this information will be provided in the RATA report required to be submitted within 60 days of the test date.

In October 2009 MDNRE requested MRD conduct a Calibration Gas Audit (CGA) on the Zurn O2 analyzer. MRD's stance has been that this analyzer does not apply to Appendix F, including the CGA which is detailed in Section 5 of Appendix F. However, MRD agreed to begin conducting quarterly CGAs starting first quarter 2010. The CGAs were conducted on the Zurn O2 analyzer successfully in all quarters of 2010 and First Quarter 2011; although, the oxygen cylinders used to conduct the CGAs were not EPA protocol gases. MRD does not feel this is a violation, since the rule is not applicable. MRD will continue to utilize the current oxygen cylinder unless directed differently by your office.

Please note, under the refinery's Title V permit in Table E-1.3, Section III.A.1 it indicates that quarterly cylinder gas audits of the FCCU opacity monitor are required; however, a quarterly cylinder gas audit program does not exist for this type of analyzer. The refinery is maintaining the analyzer according to the PTI 28-02A and completing a yearly audit of the analyzer. The refinery has requested a wording modification in the Title V renewal.

I certify under penalty of law that this information was prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my directions and my inquiry of the person(s) who manage the system, or the person(s) directly responsible for gathering the information, the information in Appendices A through C of this submittal is, to the best of my knowledge and belief, true, accurate, and complete. Please contact Tabetha Daum at (313) 297-4701 if you have any questions concerning this submittal.

Sincerely,

Marathon Petroleum Company LP

By: MPC Investment LLC, General Partner

Mr. C.T. Case, Deputy Assistant Secretary

Attachments

cc: Technical Programs Unit - MDNRE: AQD - c/o Karen Kajiya-Mills - Federal Express

Chief, Environmental Enforcement Section, Environment and Natural Resources Division, U.S. DOJ - Federal Express

U.S. EPA, Director of Air Enforcement Division c/o Matrix Environmental and Geotechnical– *Federal Express*

Air and Radiation Division, U.S. EPA Region 5 – Federal Express

Office of Regional Counsel, U.S. EPA Region 5 - Federal Express

MICHIGAN DEPARTMENT OF NATURAL RESOURCES AND ENVIRONMENT AIR QUALITY DIVISION

RENEWABLE OPERATING PERMIT REPORT CERTIFICATION

Authorized by 1994 P.A. 451, as amended. Failure to provide this information may result in civil and/or criminal penalties.

Reports submitted pursuant to R 336.1213 (Rule 213), subrules (3)(c) and/or (4)(c), of Michigan's Renewable Operating Permit (ROP) program must be certified by a responsible official. Additional information regarding the reports and documentation listed below must be kept on file for at least 5 years, as specified in Rule 213(3)(b)(ii), and be made available to the Department of Natural Resources and Environment, Air Quality Division upon request.

Source Name Mar	athon Petroleum Co	ompany LP			County Wayne	
Source Address1.	300 South Fort Str	eet		City	Detroit	
AQD Source ID (SRN	I) A9831	ROP No.	199700013c		ROP Section No.	01
Please check the appr						
│	nce Certification (Pur	suant to Rule 213(4)	(c))			I
Reporting period	(provide inclusive dates)): From	То			
term and condit	entire reporting period, the ion of which is identified ified in the ROP.	nis source was in com and included by this	pliance with ALL ter reference. The met	ms and co hod(s) use	nditions contained i d to determine com	n the ROP, each oliance is/are the
term and condi deviation report	entire reporting period to tion of which is identifie (s). The method used to e indicated and describe	d and included by the determine complian	is reference, EXCEI nce for each term an	PT for the	deviations identified	on the enclosed
☐ Semi-Annual (o	r More Frequent) Repo	ort Certification (Pu	suant to Rule 213(3)(c))		
			_ `			
	(provide inclusive dates entire reporting period, A	·	To	ning roquir	oments in the POD	wore met and no
	these requirements or a			Jing requir	ements in the NOP	were met and no
☐ 2. During the e deviations from enclosed deviat	entire reporting period, a these requirements or a ion report(s).	Il monitoring and asso any other terms or con	ociated recordkeepin nditions occurred, EX	g requiren (CEPT for	nents in the ROP we the deviations ident	ere met and no ified on the
	rtification					
Reporting period	(provide inclusive dates)): From 1/1/2	011 To	3/31/2	011	
	i <mark>ng reports or other app</mark> 2011 Continuous En		•			n
Report.						
			AP 7			
	n information and belie are true, accurate and c		nable inquiry, the st	atements	and information in t	this report and the
•	a. a a.a., acourate and t	its Ger	neral Partner		04.5	42 0100
C.T. Case Name of Responsible	Official (print or type)	Deput	y Assistant Secretary Title			43-9100 Number
017	7					4-11
Signature of Responsi	ble Official			*******************************		Date

^{*} Photocopy this form as needed.

Appendix A

CEMS Downtime and Excess Emissions Summary Reports

CO Opacity (Circle One) Pollutant: CO2 02 **TRS** H2S HC1 Other: N/A Monitor Model: Limas 11 (NOx) Reporting Quarter: First Facility: Marathon Petroleum Company LP Manufacturer: ABB 1300 South Fort Street Detroit, MI 48217 Emission Limit: 0.20 lbs/MMBTU Emission Unit: BW Boiler Average Time: daily average Total Operating Hours of Emission Unit: 2160 hrs

Emission Data Summary		CEM Performance Summar	y			
Duration of Excess Emissions		Duration of CEM Downtime During Source Operation				
A. Startup/Shutdown	0.00 hrs	A. Monitor Malfunction	0.00hrs			
B. Control Equipment	0.00 hrs	B. Non- Monitor Malfunction	0.00 hrs			
C. Process Problems	0.00 hrs	C. QA Calibration	2.00hrs			
D. Other Known Causes	0.00 hrs	D. Other Known Causes	0.00 hrs			
E. Unknown Causes	0.00hrs	E. Unknown Causes	0.00 hrs			
2. Total Duration	0.00 hrs	2. Total Duration	2.00hrs			
3. Percent of Total Excess Emissions	0.00 %	3. Percent of Total CEM Downtime	0.09 %			

^{(%} Total excess emissions) = (Total duration of excess emissions) / (Total operating time) x 100%

^{(%} CEM downtime) = (Total duration of CEM downtime) / (Total operating time) x 100%

Pollutant:	SO2	NOx	(co)	CO2	O2	TRS	H2S	HC1	Opacity	(Circle One))	
Other: _	N/A		_									
Reporting	Quarter:	First	2011			Monit	or Model:	URAS 14	I (CO)			
	Facility:	Maratho	n Petroleum	Company	· LP	Manı	ufacturer:	ABB				
		1300 So	uth Fort Stre	et								
		Detroit, N	MI 48217		*****	Emiss	ion Limit:	400 ppm				
Emiss	ion Unit:	BW Boile	er (CO)			Aver	age Time:	daily ave	rage	<u> </u>		
					T	otal Opera	ıtina Hour	s of Emis	sion Unit:	2160	hrs	

Emission Data Summary		CEM Performance Summary					
1. Duration of Excess Emissions		Duration of CEM Downtime During Source Operation					
A. Startup/Shutdown	0.00 hrs	A. Monitor Malfunction	0.00 hrs				
B. Control Equipment	0.00 hrs	B. Non- Monitor Malfunction	0.00hrs				
C. Process Problems	0.00 hrs	C. QA Calibration	2.00 hrs				
D. Other Known Causes	0.00 hrs	D. Other Known Causes	0.00 hrs				
E. Unknown Causes	0.00 hrs	E. Unknown Causes	0.00hrs				
2. Total Duration	0.00 hrs	2. Total Duration	hrs				
3. Percent of Total Excess Emissions	0.00 %	3. Percent of Total CEM Downtime	0.09 %				

^{(%} Total excess emissions) = (Total duration of excess emissions) / (Total operating time) x 100%

^{(%} CEM downtime) = (Total duration of CEM downtime) / (Total operating time) x 100%

Pollutant:	SO2	NOx	CO	CO2	(02)	TRS	H2S	HC1	Opacity	(Circle One)
Other:	N/A		_								
Reporting	Quarter:	First	2011	-		Monit	or Model:	Magnos	106 (O2)		
	Facility:	Maratho	n Petroleum	n Company	/ LP	Man	ufacturer:	ABB	-		
		1300 So	uth Fort Str	eet							
		Detroit, 1	MI 48217			Emiss	ion Limit:	none			
Emiss	ion Unit:	BW Boile	er (O2)			Aver	age Time:	none			
					To	otal Opera	ating Hour	s of Emis	sion Unit:	2160	hrs

Emission Data Summary		CEM Performance Summary					
Duration of Excess Emissions		Duration of CEM Downtime During Source Operation					
A. Startup/Shutdown	0.00 hrs	A. Monitor Malfunction	0.00hrs				
B. Control Equipment	0.00 hrs	B. Non- Monitor Malfunction	0.00 hrs				
C. Process Problems	0.00 hrs	C. QA Calibration	2.00 hrs				
D. Other Known Causes	0.00 hrs	D. Other Known Causes	0.00hrs				
E. Unknown Causes	0.00hrs	E. Unknown Causes	0.00 hrs				
2. Total Duration	0.00 hrs	2. Total Duration	hrs				
3. Percent of Total Excess Emissions	0.00 %	3. Percent of Total CEM Downtime	0.09 %				

^{(%} Total excess emissions) = (Total duration of excess emissions) / (Total operating time) x 100%

^{(%} CEM downtime) = (Total duration of CEM downtime) / (Total operating time) x 100%

Pollutant:

SO2

CO CO2 02

TRS

H2S

HC1

Opacity (Circle One)

Other: N/A

Reporting Quarter: __ First 2011

Monitor Model: Limas 11 (NOx)

Facility: Marathon Petroleum Company LP

1300 South Fort Street

Detroit, MI 48217

Emission Unit: FCCU Regenerator

Emission Limit: 123 ppm

Manufacturer: ABB

Average Time: 7 day average

Emission Limit: 93 ppm

Average Time: 365 day average

Total Operating Hours of Emission Unit: 2160 hrs

Emission Data Summary		CEM Performance Summary						
Duration of Excess Emissions		Duration of CEM Downtime During Section 2. 1. Duration of CEM Downtime During Section 2. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1.	ource Operation					
A. Startup/Shutdown	0.00 hrs	A. Monitor Malfunction	32.00hrs					
B. Control Equipment	0.00hrs	B. Non- Monitor Malfunction	0.00 hrs					
C. Process Problems	0.00 hrs	C. QA Calibration	37.00 hrs					
D. Other Known Causes	0.00 hrs	D. Other Known Causes	0.00 hrs					
E. Unknown Causes	0.00hrs	E. Unknown Causes	0.00 hrs					
2. Total Duration	0.00 hrs	2. Total Duration	69.00 hrs					
3. Percent of Total Excess Emissions	0.00 %	3. Percent of Total CEM Downtime	3.19 %					

^{(%} Total excess emissions) = (Total duration of excess emissions) / (Total operating time) x 100%

^{(%} CEM downtime) = (Total duration of CEM downtime) / (Total operating time) x 100%

Pollutant:	SO2	NOx	(co)	CO2	O2	TRS	H2S	HC1	Opacity	(Circle One)	
Other: <u>I</u>	N/A		_								
Reporting	Quarter: _	First	2011			Monit	or Model:	URAS 14	I (CO)		
	Facility: _	Maratho	n Petroleum	Company	LP	Manı	ufacturer:	ABB			
	_	1300 So	uth Fort Stre	et		_					
		Detroit, N	AI 48217			Emiss	ion Limit:	500 ppm			
	_					Aver	age Time:	one hour	average		
Emiss	ion Unit: _	FCCU R	egenerator			-					
					Т	otal Opera	ating Hour	s of Emis	sion Unit	2160h	nrs

Emission Data Summary		CEM Performance Summary						
Duration of Excess Emissions		1. Duration of CEM Downtime During S	ource Operation					
A. Startup/Shutdown	0.00 hrs	A. Monitor Malfunction	32.00 hrs					
B. Control Equipment	0.00 hrs	B. Non- Monitor Malfunction	0.00 hrs					
C. Process Problems	0.00 hrs	C. QA Calibration	<u>37.00</u> hrs					
D. Other Known Causes	0.00 hrs	D. Other Known Causes	0.00 hrs					
E. Unknown Causes	0.00 hrs	E. Unknown Causes	0.00hrs					
2. Total Duration	hrs	2. Total Duration	69.00hrs					
3. Percent of Total Excess Emissions	0.00%	3. Percent of Total CEM Downtime	3.19 %					

^{(%} Total excess emissions) = (Total duration of excess emissions) / (Total operating time) x 100%

^{(%} CEM downtime) = (Total duration of CEM downtime) / (Total operating time) x 100%

Pollutant:	(SO2)	NOx	CO	CO2	02	TRS	H2S	HC1	Opacity	(Circle One)	
Other:	N/A		_								
Reporting	Quarter:	First	2011			Monito	or Model:	Limas 11	(SO2)	****	
	Facility:	Marathor	n Petroleum	Company	LP	Manı	ıfacturer:	ABB	~~~	. VI. W. W.	
		1300 Soi	uth Fort Stre	et							
		Detroit, N	/II 48217			Emission Limit: 70 ppm					
	•					Avera	ige Time:	7 day ave	erage		
Emiss	ion Unit:	FCCU R	egenerator			Emissi	on Limit:	35 ppm			
	•		-			Avera	ige Time:	365 day	average		
							_	<u>-</u>			

Total Operating Hours of Emission Unit: 2160 hrs

Emission Data Summary			CEM Performance Summary						
Duration of Excess Emissions			Duration of CEM Downtime During Source Operation						
A. Startup/Shutdown	0.00	hrs	A. Monitor Malfunction	32.00	hrs				
B. Control Equipment	0.00	hrs	B. Non- Monitor Malfunction	0.00	hrs				
C. Process Problems	0.00	hrs	C. QA Calibration	37.00	hrs				
D. Other Known Causes	0.00	hrs	D. Other Known Causes	0.00	hrs				
E. Unknown Causes	0.00	hrs	E. Unknown Causes	0.00	_hrs				
2. Total Duration	0.00	hrs	2. Total Duration	69.00	hrs				
Percent of Total Excess Emissions	0.00	_%	3. Percent of Total CEM Downtime	3.19	_%				

^{(%} Total excess emissions) = (Total duration of excess emissions) / (Total operating time) x 100%

^{(%} CEM downtime) = (Total duration of CEM downtime) / (Total operating time) x 100%

Pollutant:	SO2	NOx	СО	CO2	(02)	TRS	H2S	HC1	Opacity	(Circle One)
Other: <u>I</u>	N/A		-							
Reporting	Quarter:	First	2011			Monito	or Model:	Magnos	16 (O2)	
	Facility:	Marathon	Petroleum	Compan	y LP	Manu	ıfacturer:	ABB		
		1300 Sou	th Fort Stre	eet						
		Detroit, M	II 48217			Emissi	on Limit:	none		
				•		Avera	ige Time:	none		
Emiss	ion Unit:	FCCU Re	generator							

Total Operating Hours of Emission Unit: 2160 hrs

Emission Data Summary		CEM Performance Summary						
1. Duration of Excess Emissions		Duration of CEM Downtime During Section 2.	ource Operation					
A. Startup/Shutdown	0.00 hrs	A. Monitor Malfunction	32.00 hrs					
B. Control Equipment	0.00 hrs	B. Non- Monitor Malfunction	0.00 hrs					
C. Process Problems	0.00 hrs	C. QA Calibration	37.00 hrs					
D. Other Known Causes	0.00hrs	D. Other Known Causes	0.00 hrs					
E. Unknown Causes	0.00 hrs	E. Unknown Causes	0.00 hrs					
2. Total Duration	0.00 hrs	2. Total Duration	69.00hrs					
3. Percent of Total Excess Emissions	0.00%	3. Percent of Total CEM Downtime	3.19 %					

^{(%} Total excess emissions) = (Total duration of excess emissions) / (Total operating time) x 100%

^{(%} CEM downtime) = (Total duration of CEM downtime) / (Total operating time) x 100%

Pollutant:	SO2	NOx	co	CO2	02	TRS	H2S	HC1	Opacity) (Circle One)		
Other:	N/A		-								
Reporting	Quarter: _	First	2011			Monite	or Model:	Lighthaw	vk 560		
	Facility:	Marathor	Petroleum	Company	LP	Manu	ufacturer:	Teledyne	e Monitor Labs		
	_	<u>1300 Sοι</u>	th Fort Str	eet							
		Detroit, N	11 48217			Emission Limit: 20% opacity					
	_					Avera	age Time:	6 minute	average		
Emiss	ion Unit:	FCCU R	egenerator								
	_					_					

Total Operating Hours of Emission Unit: 2160 hrs

Emission Data Summary		CEM Performance Summary					
1. Duration of Excess Emissions		Duration of CEM Downtime During Source Operation					
A. Startup/Shutdown	0.00 hrs	A. Monitor Malfunction	0.00 hrs				
B. Control Equipment	0.00 hrs	B. Non- Monitor Malfunction	0.00 hrs				
C. Process Problems	0.00 hrs	C. QA Calibration	5.00 hrs				
D. Other Known Causes	0.00 hrs	D. Other Known Causes	0.00 hrs				
E. Unknown Causes	0.00 hrs	E. Unknown Causes	0.00 hrs				
2. Total Duration	0.00hrs	2. Total Duration	5.00hrs				
3. Percent of Total Excess Emissions	0.00%	3. Percent of Total CEM Downtime	0.23 %				

^{(%} Total excess emissions) = (Total duration of excess emissions) / (Total operating time) x 100%

^{(%} CEM downtime) = (Total duration of CEM downtime) / (Total operating time) x 100%

Pollutant:	SO2	NOx	CO	CO2	O2	TRS (H2S) HC1 Opacity (Circle One)
Other: _	N/A					
Reporting	Quarter:	First	2011			Monitor Model: 2000GC
	Facility:			Company	LP	Manufacturer: ABB
		Detroit, N	uth Fort Str /// 48217	eet		Emission Limit: 162 ppm
						Average Time: 3 hour average
Emiss	ion Unit:	West Pla	int Fuel Gas	S NSPS Hea	aters	

Total Operating Hours of Emission Unit: 2160 hrs

Emission Data Summary		CEM Performance Summary					
Duration of Excess Emissions		Duration of CEM Downtime During Source Operation					
A. Startup/Shutdown	0.00 hrs	A. Monitor Malfunction	4.00	hrs			
B. Control Equipment	0.00hrs	B. Non- Monitor Malfunction	0.00	hrs			
C. Process Problems	0.00 hrs	C. QA Calibration	4.00	hrs			
D. Other Known Causes	0.00 hrs	D. Other Known Causes	0.00	hrs			
E. Unknown Causes	0.00 hrs	E. Unknown Causes	0.00	hrs			
2. Total Duration	0.00hrs	2. Total Duration	8.00	_hrs			
3. Percent of Total Excess Emissions	0.00 %	3. Percent of Total CEM Downtime	0.37	_%			

(% Total excess emissions) = (Total duration of excess emissions) / (Total operating time) x 100%

(% CEM downtime) = (Total duration of CEM downtime) / (Total operating time) x 100%

Pollutant:	SO2	NOx	CO	CO2	02	TRS (H2S) HC1 Opacity (Circle One)
Other: <u>l</u>	N/A		_			
Reporting	Quarter:	First	2011	-		Monitor Model: 2000 Vista II
	Facility:		n Petroleum uth Fort Str	n Company eet	LP	Manufacturer: ABB
		Detroit, N	AI 48217			Emission Limit: 162 ppm
Emiss	ion Unit:	East Pla	nt Fuel Gas	NSPS Hea	aters	Average Time: 3 hour average
					To	otal Operating Hours of Emission Unit: 2160 hrs

Emission Data Summary		CEM Performance Summary					
Duration of Excess Emissions		Duration of CEM Downtime During Source Operation					
A. Startup/Shutdown	0.00 hrs	A. Monitor Malfunction	0.00 hrs				
B. Control Equipment	0.00 hrs	B. Non- Monitor Malfunction	72.00 hrs				
C. Process Problems	1.00 hrs	C. QA Calibration	3.00 hrs				
D. Other Known Causes	0.00 hrs	D. Other Known Causes*	22.00 hrs				
E. Unknown Causes	0.00hrs	E. Unknown Causes	hrs				
2. Total Duration	1.00hrs	2. Total Duration	97.00hrs				
3. Percent of Total Excess Emissions	0.05 %	3. Percent of Total CEM Downtime	4.49%				

^{(%} Total excess emissions) = (Total duration of excess emissions) / (Total operating time) x 100%

^{(%} CEM downtime) = (Total duration of CEM downtime) / (Total operating time) x 100%

^{*} The sample line froze causing the downtime.

Pollutant:	SO2	NOx) co	CO2	O2	TRS	H2S	HC1	Opacity	(Circle One)		
Other: <u>1</u>	N/A		_									
Reporting	Quarter:	First	2011	-		Monit	or Model:	ENDA-11	20			
	Facility: Marathon Petroleum Company LP 1300 South Fort Street					Manufacturer: Horiba						
		Detroit, N		cci		-	ion Limit:					
Emissi	ion Unit:	Zurn Boil	er			Avera	age Time:	24 hour a	verage			
					T	otal Opera	ting Hours	s of Emis	sion Unit:	2160	hrs	

Emission Data Summary		CEM Performance Summary					
1. Duration of Excess Emissions		Duration of CEM Downtime During Source Operation					
A. Startup/Shutdown	0.00hrs	A. Monitor Malfunction	0.00hrs				
B. Control Equipment	0.00 hrs	B. Non- Monitor Malfunction	0.00 hrs				
C. Process Problems	0.00 hrs	C. QA Calibration	3.00 hrs				
D. Other Known Causes	0.00 hrs	D. Other Known Causes	0.00 hrs				
E. Unknown Causes	0.00hrs	E. Unknown Causes	0.00 hrs				
2. Total Duration	0.00hrs	2. Total Duration	3.00 hrs				
3. Percent of Total Excess Emissions	0.00 %	3. Percent of Total CEM Downtime	0.14 %				

^{(%} Total excess emissions) = (Total duration of excess emissions) / (Total operating time) x 100%

^{(%} CEM downtime) = (Total duration of CEM downtime) / (Total operating time) x 100%

Pollutant:	SO2	NOx	co	CO2	(02)	TRS	H2S	HC1	Opacity	(Circle One)	
Other: <u>I</u>	N/A		-								
Reporting	Quarter:	First	2011			Monit	or Model:	ZA8			
	Facility:		n Petroleum		ny LP	Man	ufacturer:	Yokagow	/a		
		1300 Soi	uth Fort Stre	eet							
		Detroit, N	/II 48217			Emiss	ion Limit:	none			
			<u>-u</u>			Aver	age Time:	none			
Emiss	ion Unit:	Zurn Boi	ler								
					Tot	tal Opera	ating Hour	s of Emis	sion Unit:	<u>2160</u> h	ırs

Emission Data Summary		CEM Performance Summary					
Duration of Excess Emissions		Duration of CEM Downtime During Source Operation					
A. Startup/Shutdown	0.00 hrs	A. Monitor Malfunction	0.00hrs				
B. Control Equipment	0.00 hrs	B. Non- Monitor Malfunction	0.00 hrs				
C. Process Problems	0.00 hrs	C. QA Calibration	3.00 hrs				
D. Other Known Causes	0.00 hrs	D. Other Known Causes	0.00hrs				
E. Unknown Causes	0.00 hrs	E. Unknown Causes	0.00 hrs				
2. Total Duration	0.00hrs	2. Total Duration	3.00 hrs				
3. Percent of Total Excess Emissions	0.00 %	3. Percent of Total CEM Downtime	0.14 %				

^{(%} Total excess emissions) = (Total duration of excess emissions) / (Total operating time) x 100%

^{(%} CEM downtime) = (Total duration of CEM downtime) / (Total operating time) x 100%

Pollutant: SO2	NOx	CO	CO2	O2	TRS	H2S	HC1	Opacity	(Circle One)
Other: N/A									
Reporting Quarter:	First	2011			Monito	or Model:	LIMAS-11	I-UV	
Facility:	Maratho	n Petroleum (Company	/ LP	Manufacturer: ABB Advance Optima				
	1300 So	uth Fort Stree	et						
	Detroit, N	MI 48217			Emission Limit: 250 ppm				
				Average Time: 12 hour average					
Emission Unit:	Sulfur Re	ecovery Unit	Thermal	Oxidizer		-			

Total Operating Hours of Emission Unit: 2160 hrs

Emission Data Summary		CEM Performance Summary						
Duration of Excess Emissions		Duration of CEM Downtime During Source Operation						
A. Startup/Shutdown	0.00 hrs	A. Monitor Malfunction	26.00 hrs					
B. Control Equipment	0.00 hrs	B. Non- Monitor Malfunction	0.00 hrs					
C. Process Problems	9.00 hrs	C. QA Calibration	4.00 hrs					
D. Other Known Causes	0.00 hrs	D. Other Known Causes*	15.00 hrs					
E. Unknown Causes	0.00hrs	E. Unknown Causes	0.00 hrs					
2. Total Duration	9.00hrs	2. Total Duration	45.00 hrs					
3. Percent of Total Excess Emissions	0.42 %	3. Percent of Total CEM Downtime	%					

^{(%} Total excess emissions) = (Total duration of excess emissions) / (Total operating time) x 100%

^{(%} CEM downtime) = (Total duration of CEM downtime) / (Total operating time) x 100%

^{*} The sample line froze causing the downtime.

Pollutant:	SO2	NOx	CO	CO2 (O2) TRS	H2S	HC1	Opacity	(Circle One)	
Other: <u>I</u>	N/A		_						•	
Reporting	Quarter:	First	2011		Monit	or Model:	MAGNO	S 106/206	···	
	Facility:		n Petroleum uth Fort Stre	Company LP	Man	ufacturer:	ABB Adv	ance Optir	na	
		Detroit, I				ion Limit:				
Emissi	ion Unit:	Sulfur Re	ecovery Uni	t Thermal Oxidize		age Time:	none			
					Total Opera	ating Hour	s of Emis	sion Unit:	2160hrs	

Emission Data Summary		CEM Performance Summary						
1. Duration of Excess Emissions		Duration of CEM Downtime During Source Operation						
A. Startup/Shutdown	0.00 hrs	A. Monitor Malfunction	26.00hrs					
B. Control Equipment	0.00 hrs	B. Non- Monitor Malfunction	0.00 hrs					
C. Process Problems	0.00 hrs	C. QA Calibration	hrs					
D. Other Known Causes	0.00 hrs	D. Other Known Causes*	15.00 hrs					
E. Unknown Causes	0.00 hrs	E. Unknown Causes	0.00 hrs					
2. Total Duration	0.00hrs	2. Total Duration	45.00 hrs					
3. Percent of Total Excess Emissions	0.00%	3. Percent of Total CEM Downtime	%					

^{(%} Total excess emissions) = (Total duration of excess emissions) / (Total operating time) x 100%

^{(%} CEM downtime) = (Total duration of CEM downtime) / (Total operating time) x 100%

^{*} The sample line froze causing the downtime.

Pollutant:	SO2	NOx	(co)	CO2	02	TRS	H2S	HC1	Opacity	(Circle One)	
Other:	N/A		-								
Reporting	Quarter:	First	2011			Monito	or Model:	URAS 14	(CO)		
	Facility:	Marathor	n Petroleum	Company	LP	Manu	ıfacturer:	ABB			
	_	1300 So	uth Fort Stre	et							
		Detroit, N	/II 48217			Emissi	on Limit:	400 ppm			
	_					Avera	ige Time:	daily ave	rage		
Emiss	ion Unit:	CCR Cha	arge Heater	(CO)							

Total Operating Hours of Emission Unit: 2160 hrs

Emission Data Summary		CEM Performance Summary						
1. Duration of Excess Emissions		Duration of CEM Downtime During Source Operation						
A. Startup/Shutdown	0.00 hrs	A. Monitor Malfunction	0.00	hrs				
B. Control Equipment	0.00 hrs	B. Non- Monitor Malfunction	0.00	hrs				
C. Process Problems	0.00 hrs	C. QA Calibration	2.00	_ _hrs				
D. Other Known Causes	0.00hrs	D. Other Known Causes*	32.00	hrs				
E. Unknown Causes	0.00 hrs	E. Unknown Causes	0.00	hrs				
2. Total Duration	0.00 hrs	2. Total Duration	34.00	_hrs				
3. Percent of Total Excess Emissions	0.00 %	3. Percent of Total CEM Downtime	1.57	_%				

^{(%} Total excess emissions) = (Total duration of excess emissions) / (Total operating time) x 100%

^{(%} CEM downtime) = (Total duration of CEM downtime) / (Total operating time) x 100%

^{*} The sample line froze causing the downtime.

Pollutant:	SO2	NOx	CO	CO2	(02) TRS	H2S	HC1	Opacity	(Circle One)	
Other:	N/A										
Reporting	Quarter:	First	2011			Monit	or Model:	Magnos 1	106 (O2)		
	Facility:		n Petroleum		y LP	Manu	ıfacturer:	ABB			
		Detroit, N	uth Fort Stre //I 48217	eı			on Limit:				
Emiss	ion Unit:	CCR Cha	arge Heater	(O2)		Avera —	age Time:	none			
						Total Opera	ting Hour	s of Emis	sion Unit:	2160	hrs

Emission Data Summary		CEM Performance Summary						
Duration of Excess Emissions		Duration of CEM Downtime During Source Operation						
A. Startup/Shutdown	0.00hrs	A. Monitor Malfunction	0.00 hrs					
B. Control Equipment	0.00 hrs	B. Non- Monitor Malfunction	0.00 hrs					
C. Process Problems	0.00 hrs	C. QA Calibration	2.00 hrs					
D. Other Known Causes	0.00 hrs	D. Other Known Causes*	32.00 hrs					
E. Unknown Causes	0.00hrs	E. Unknown Causes	0.00 hrs					
2. Total Duration	0.00 hrs	2. Total Duration	34.00 hrs					
3. Percent of Total Excess Emissions	0.00 %	3. Percent of Total CEM Downtime	1.57%					

^{(%} Total excess emissions) = (Total duration of excess emissions) / (Total operating time) x 100%

^{(%} CEM downtime) = (Total duration of CEM downtime) / (Total operating time) x 100%

^{*} The sample line froze causing the downtime.

Pollutant:	SO2	NOx	(co)	CO2	O2	TRS	H2S	HC1	Opacity	(Circle One)
Other: <u>I</u>	V/A		_								
Reporting	Quarter:	First	2011			Monit	or Model:	URAS 14	(CO)	· · · · · · · · · · · · · · · · · · ·	
	Facility:		n Petroleum		LP	Manı	ufacturer:	ABB			
		1300 So	uth Fort Stre	et		_					
		Detroit, N	/ II 48217			Emiss	ion Limit:	400 ppm			
						Avera	age Time:	1 hour av	erage		
Emissi	ion Unit:	FCCU C	harge Heate	r		-					
					T	otal Opera	ting Hour	s of Emis	sion Unit:	2160	hrs

Emission Data Summary		CEM Performance Summary						
Duration of Excess Emissions		Duration of CEM Downtime During Source Operation						
A. Startup/Shutdown	0.00 hrs	A. Monitor Malfunction	0.00 hrs					
B. Control Equipment	0.00 hrs	B. Non- Monitor Malfunction	0.00 hrs					
C. Process Problems	0.00hrs	C. QA Calibration	5.00 hrs					
D. Other Known Causes	0.00 hrs	D. Other Known Causes	0.00 hrs					
E. Unknown Causes	0.00hrs	E. Unknown Causes	0.00 hrs					
2. Total Duration	0.00hrs	2. Total Duration	5.00 hrs					
3. Percent of Total Excess Emissions	0.00 %	3. Percent of Total CEM Downtime	0.23 %					

^{(%} Total excess emissions) = (Total duration of excess emissions) / (Total operating time) x 100%

^{(%} CEM downtime) = (Total duration of CEM downtime) / (Total operating time) x 100%

Pollutant:	SO2	NOx	CO	CO2	(02)	TRS	H2S	HC1	Opacity	(Circle One)
Other: <u>l</u>	N/A		-							
Reporting	Quarter: _	First	2011			Monit	or Model:	Magnos	106 (O2)	
	Facility: <u>I</u>	Marathor	n Petroleum	Compar	ny LP	Manu	ufacturer:	ABB		
	_	1300 Soi	uth Fort Stre	eet						
	[Detroit, N	/II 48217			Emissi	ion Limit:	none		
	_				•	Avera	age Time:	none		
Emiss	ion Unit: F	CCU CI	harge Heat	er						
	-									

Total Operating Hours of Emission Unit: 2160 hrs

Emission Data Summary		CEM Performance Summary						
Duration of Excess Emissions		Duration of CEM Downtime During Source Operation						
A. Startup/Shutdown	0.00 hrs	A. Monitor Malfunction	0.00 hrs					
B. Control Equipment	0.00 hrs	B. Non- Monitor Malfunction	0.00 hrs					
C. Process Problems	0.00 hrs	C. QA Calibration	5.00 hrs					
D. Other Known Causes	0.00 hrs	D. Other Known Causes	0.00 hrs					
E. Unknown Causes	0.00 hrs	E. Unknown Causes	0.00 hrs					
2. Total Duration	0.00hrs	2. Total Duration	5.00hrs					
3. Percent of Total Excess Emissions	0.00 %	3. Percent of Total CEM Downtime	%					

^{(%} Total excess emissions) = (Total duration of excess emissions) / (Total operating time) x 100%

^{(%} CEM downtime) = (Total duration of CEM downtime) / (Total operating time) x 100%

Pollutant:	SO2	NOx) co	CO2	O2	TRS	H2S	HC1	Opacity	(Circle One)
Other:	N/A		_							
Reporting	Quarter:	First	2011			Monit	or Model:	Limas 11	(NOx)	
	Facility:	Marathor	n Petroleum	Company	LP	Manu	ufacturer:	ABB		
		1300 Sou	uth Fort Stre	eet						
		Detroit, M	/II 48217			Emissi	ion Limit:	0.05 lbs/l	имвти	
						Avera	age Time:	annual ro	lling avera	ge
Emiss	ion Unit:	Crude/Va	cuum Cha	rge Heater			-		<u>\$</u>	
					To	otal Opera	ting Hour	s of Emis	sion Unit:	2160 hrs

Emission Data Summary		CEM Performance Summary						
1. Duration of Excess Emissions		Duration of CEM Downtime During Source Operation						
A. Startup/Shutdown	0.00 hrs	A. Monitor Malfunction	0.00 hrs					
B. Control Equipment	0.00 hrs	B. Non- Monitor Malfunction	0.00 hrs					
C. Process Problems	0.00 hrs	C. QA Calibration	2.00 hrs					
D. Other Known Causes	0.00 hrs	D. Other Known Causes	0.00 hrs					
E. Unknown Causes	0.00hrs	E. Unknown Causes	0.00 hrs					
2. Total Duration	0.00 hrs	2. Total Duration	hrs					
3. Percent of Total Excess Emissions	0.00 %	3. Percent of Total CEM Downtime	%					

^{(%} Total excess emissions) = (Total duration of excess emissions) / (Total operating time) x 100%

^{(%} CEM downtime) = (Total duration of CEM downtime) / (Total operating time) x 100%

Pollutant:	SO2	NOx	CO	CO2	(02)	TRS	H2S	HC1	Opacity	(Circle One)	
Other:	N/A		_								
Reporting	Quarter:	First	2011			Monit	tor Model:	Magnos	106 (O2)		T.T.1
	Facility:		n Petroleum		ıy LP	Man	ufacturer:	ABB			
		<u>1300 So</u>	uth Fort Stre	et							
		Detroit, M	MI 48217			Emiss	ion Limit:	none			
					· · · · · · · · · · · · · · · · · · ·	Aver	age Time:	none			
Emiss	ion Unit:	Crude/V	acuum Char	ge Heate	er (O2)						
					To	tal Opera	ating Hour	s of Emis	sion Unit:	2160	hrs

Emission Data Summary		CEM Performance Summary						
1. Duration of Excess Emissions		Duration of CEM Downtime During Source Operation						
A. Startup/Shutdown	0.00 hrs	A. Monitor Malfunction	0.00 hrs					
B. Control Equipment	0.00 hrs	B. Non- Monitor Malfunction	0.00 hrs					
C. Process Problems	0.00 hrs	C. QA Calibration	hrs					
D. Other Known Causes	0.00 hrs	D. Other Known Causes	0.00 hrs					
E. Unknown Causes	0.00 hrs	E. Unknown Causes	0.00 hrs					
2. Total Duration	0.00hrs	2. Total Duration	2.00hrs					
3. Percent of Total Excess Emissions	0.00%	3. Percent of Total CEM Downtime	%					

^{(%} Total excess emissions) = (Total duration of excess emissions) / (Total operating time) x 100%

^{(%} CEM downtime) = (Total duration of CEM downtime) / (Total operating time) x 100%

Pollutant:	SO2	NOx	CO	CO2	02	TRS	H2S	HC1	Opacity	(Circle One)
Other:	Flare Pilot									
Reporting	Quarter: _	First	2011			Monito	or Model:	SLX-202		
	Facility: <u>I</u>	Marathon	Petroleum	Company	LP	Manu	ıfacturer:	Powertrol		
	_	1300 Sout	h Fort Stre	et		_				
	1	Detroit, MI	48217			Emissi	on Limit:	Pilot Ligh	t Present	
						Avera	ge Time:	continuou	ısly	
Emiss	ion Unit: \	Vents to C	P Flare			_				

Total Operating Hours of Emission Unit: 2160 hrs

Emission Data Summary		CEM Performance Summary					
Duration of Excess Emissions		Duration of CEM Downtime During Source Operation					
A. Startup/Shutdown	0.00 hrs	A. Monitor Malfunction	0.00 hrs				
B. Control Equipment	0.00 hrs	B. Non- Monitor Malfunction	0.00 hrs				
C. Process Problems	0.00hrs	C. QA Calibration	0.00 hrs				
D. Other Known Causes	0.00 hrs	D. Other Known Causes*	29.00 hrs				
E. Unknown Causes	0.00 hrs	E. Unknown Causes	0.00 hrs				
2. Total Duration	0.00 hrs	2. Total Duration	hrs				
3. Percent of Total Excess Emissions	0.00 %	3. Percent of Total CEM Downtime	1.34%				

(% Total excess emissions) = (Total duration of excess emissions) / (Total operating time) x 100%

(% CEM downtime) = (Total duration of CEM downtime) / (Total operating time) x 100%

If there were no exceedences, the required analyses were made and no CEM downtime and/or excess emissions occurred during the reporting period.

*Other Known Causes: Hours in this category are attributed to weather. Including rain, snow, and fog from cooling tower operations interfering with the sight of the analyzer. Visual checks verified a pilot was present.

Pollutant: SO2 NOx CO CO2 O2 TRS H2S HC1 Opacity (Circle One)

Other: Flare Pilot

Reporting Quarter: First 2011 Monitor Model: SLX-202

Facility: Marathon Petroleum Company LP Manufacturer: Powertrol

1300 South Fort Street

Detroit, MI 48217 Emission Limit: Pilot Light Present

Average Time: continuously

Emission Unit: Vents to Alkylation Unit Flare

Total Operating Hours of Emission Unit: 2160 hr

Emission Data Summary		CEM Performance Summary						
Duration of Excess Emissions		Duration of CEM Downtime During Source Operation						
A. Startup/Shutdown	0.00 hrs	A. Monitor Malfunction	0.00 hrs					
B. Control Equipment	0.00 hrs	B. Non- Monitor Malfunction	0.00 hrs					
C. Process Problems	0.00 hrs	C. QA Calibration	1.00 hrs					
D. Other Known Causes	0.00 hrs	D. Other Known Causes*	30.00 hrs					
E. Unknown Causes	0.00hrs	E. Unknown Causes	0.00 hrs					
2. Total Duration	0.00 hrs	2. Total Duration	31.00hrs					
3. Percent of Total Excess Emissions	0.00 %	3. Percent of Total CEM Downtime	1.44%					

^{(%} Total excess emissions) = (Total duration of excess emissions) / (Total operating time) x 100%

If there were no exceedences, the required analyses were made and no CEM downtime and/or excess emissions occurred during the reporting period.

*Other Known Causes: Hours in this category are attributed to weather. Including rain, snow, and fog from cooling tower operations interfering with the sight of the analyzer. Visual checks verified a pilot was present.

^{(%} CEM downtime) = (Total duration of CEM downtime) / (Total operating time) x 100%

Pollutant: SO2 NOx CO CO2 O2 TRS H2S HC1 Opacity (Circle One)

Other: Flare Pilot

Emission Unit: Vents to Unifiner Flare

Reporting Quarter: First 2011 Monitor Model: SLX-202

Facility: Marathon Petroleum Company LP Manufacturer: Powertrol

1300 South Fort Street

Detroit, MI 48217

Emission Limit: Pilot Light Present

Average Time: continuously

Total Operating Hours of Emission Unit:

2160

Emission Data Summary		CEM Performance Summary						
1. Duration of Excess Emissions		Duration of CEM Downtime During So	ource Operation					
A. Startup/Shutdown	0.00 hrs	A. Monitor Malfunction	0.00hrs					
B. Control Equipment	0.00 hrs	B. Non- Monitor Malfunction	0.00 hrs					
C. Process Problems	0.00hrs	C. QA Calibration	1.00 hrs					
D. Other Known Causes	0.00 hrs	D. Other Known Causes*	4.00 hrs					
E. Unknown Causes	0.00 hrs	E. Unknown Causes	0.00hrs					
2. Total Duration	0.00hrs	2. Total Duration	5.00hrs					
3. Percent of Total Excess Emissions	0.00%	3. Percent of Total CEM Downtime	0.23 %					

^{(%} Total excess emissions) = (Total duration of excess emissions) / (Total operating time) x 100%

If there were no exceedences, the required analyses were made and no CEM downtime and/or excess emissions occurred during the reporting period.

*Other Known Causes: Hours in this category are attributed to weather. Including rain, snow, and fog from cooling tower operations interfering with the sight of the analyzer. Visual checks verified a pilot was present.

^{(%} CEM downtime) = (Total duration of CEM downtime) / (Total operating time) x 100%

Pollutant:	SO2	NOx	CO	CO2	02	TRS	H2S	HC1	Opacity	(Circle One)	
Other: <u>F</u>	lare Pilot										
Reporting	Quarter: _	First	2011			Monito	or Model:	SLX-202			
	Facility: M				LP	Manu	ıfacturer:	Powertro			
		300 South etroit, MI		et		Emissi	on Limit:	Pilot Ligh	t Present		
Emissi	on Unit: <u>V</u>	ents to Cr	ude Flare			Avera	ige Time:	continuou	ısly		

Total Operating Hours of Emission Unit: 2160 hrs

Emission Data Summary		CEM Performance Summary					
1. Duration of Excess Emissions		Duration of CEM Downtime During Section 2. 1. Duration of CEM Downtime During Section 2. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1.	ource Operation				
A. Startup/Shutdown	0.00 hrs	A. Monitor Malfunction	0.00 hrs				
B. Control Equipment	0.00 hrs	B. Non- Monitor Malfunction	0.00 hrs				
C. Process Problems	0.00 hrs	C. QA Calibration	0.00 hrs				
D. Other Known Causes	0.00 hrs	D. Other Known Causes*	34.00 hrs				
E. Unknown Causes	0.00 hrs	E. Unknown Causes	hrs				
2. Total Duration	0.00 hrs	2. Total Duration	34.00hrs				
3. Percent of Total Excess Emissions	0.00 %	3. Percent of Total CEM Downtime	1.57%				

^{(%} Total excess emissions) = (Total duration of excess emissions) / (Total operating time) x 100%

^{(%} CEM downtime) = (Total duration of CEM downtime) / (Total operating time) x 100%

^{*}Other Known Causes: Hours in this category are attributed to weather. Including rain, snow, and fog from cooling tower operations interfering with the sight of the analyzer. Visual checks verified a pilot was present.

Appendix B

New Source Performance Standards (NSPS) Subpart J Alternate Monitoring Plan (AMP) Data

Complex 2 (AMP Sheet) - A

Complex 4 (Lab Data)

Complex 2 (Lab Data)

Alky Spent Caustic Date H2S ppm When flaring		CCR/SR Recycle H2 H2S ppm 2 x year	DHT/Unifiner Recycle H2 H2S ppm 5 x week
1/1/2011		<1	<1
1/2/2011		<1 <1	230 *
1/3/2011		<1	60 *
1/4/2011		<1	50 *
1/5/2011		<1	40 *
1/6/2011		<1	20
1/7/2011		<1	15 *
1/8/2011		<1	<1
1/9/2011		<1	10 *
1/10/2011		<1	10 *
1/11/2011		<1	20 *
1/12/2011		<1	<1
1/13/2011		<1	25 *
1/14/2011	0	<1	1100 *
1/15/2011	0	<1	2000 *
1/16/2011	0		1000 *
1/17/2011	0	<1	489 *
1/18/2011	0	<1	1000 *
1/19/2011 1/20/2011	0 0	<1 <1	200 *
1/20/2011	0	<1 <1	200 * 1000 *
1/21/2011	0	<1	ND
1/23/2011	0	<1	<1
1/24/2011	0	<1	<1
1/25/2011	0	<1	<1
1/26/2011	0	<1	<1
1/27/2011	0	<1	<1
1/28/2011	0	<1	<1
1/29/2011	0	<1	<1
1/30/2011	0	<1	<1
1/31/2011	0	<1	<1
2/1/2011	0	<1	<1
2/2/2011	0	<1	<1
2/3/2011	0	<1	<1
2/4/2011	0	<1	<1
2/5/2011	0	<1	<1
2/6/2011	0	<1	<1
2/7/2011 2/8/2011	0 0	<1 <1	<1 <1
2/9/2011	0	<1	<1
2/10/2011	0	<1	<1
2/11/2011	0	<1	<1
2/12/2011	0	<1	<1
2/13/2011	0	<1	<1
2/14/2011	0	<1	<1
2/15/2011	0	<1	<1
2/16/2011	0	<1	<1
2/17/2011	0	<1	<1
2/18/2011	0	<1	40 *
2/19/2011	0	<1	<1
2/20/2011	0	<1	<1
2/21/2011	0	<1	<1
2/22/2011	0	<1	<1
2/23/2011	0	<1	<1
2/24/2011	0	<1	<1
2/25/2011	0	<1	<1
2/26/2011		<1	<1

Alternative Monitoring Plan Data

2/27/2011	0	<1	<1
2/28/2011	0	<1	<1
3/1/2011		<1	<1
3/2/2011		<1	<1
3/3/2011	0	<1	<1
3/4/2011	0	<1	<1
3/5/2011	0	<1	<1
3/6/2011	0	<1	<1
3/7/2011	0	<1	<1
3/8/2011	0	<1	<1
3/9/2011	0	<1	<1
3/10/2011	0	<1	<1
3/11/2011	0	<1	<1
3/12/2011	0	<1	10
3/13/2011	0	<1	<1
3/14/2011	0	<1	<1
3/15/2011	0	<1	<1
3/16/2011	0	<1	<1
3/17/2011	0	<1	<1
3/18/2011	0	<1	<1
3/19/2011	0	<1	<1
3/20/2011	0	<1	<1
3/21/2011	0	<1	<1
3/22/2011	0	<1	<1
3/23/2011	0	<1	<1
3/24/2011	0	<1	<1
3/25/2011	0	<1	<1
3/26/2011	0	<1	< 0.05
3/27/2011	0	<1	<1
3/28/2011	0	<1	<1
3/29/2011	0	<1	<1
3/30/2011	0	<1	<1
3/31/2011	0	<1	<1
			*No flaring occurred.
			-

1	Complex 3 (RADAR) - B		Complex 3 (RADAR) - C		Complex 4 (AMP Sheet) - D		Complex 4 (AMP Sheet) - E
1				Most		Most	
Most Recent	t		CP Spent Caustic	Recent		Recent	
Sample	FCCU Disulfide off-	Most Recent	Drum Vent	Sample	SR Aromatics Sump	Sample	CCR Chlorsorb Vent
Dates	gas H2S ppm	Sample Dates	H2S ppm	Dates	Vent H2S ppm	Dates	SO2 ppm
1	2 x year		2 x year		2 x year		2 x year
7/5/2010	0	7/5/2010	0	2/23/2011	0	2/16/2010	0
1/4/2011	0	1/4/2011	0	3/31/2011	0	3/30/2011	0

Appendix C

Cylinder Gas Audit (CGA) Information

Analyzer: B&W Boiler CEMS

Analyzer Manufacturer: ABB

Analyzer model #'s: Limas 11 (NOx), Magnos 106 (O2), Uras 14 (CO)

Constituents monitored (w/ranges): NOx (0-500), CO (0-500), O2 (0-10%)

Date CGA performed: 2/8/2011

Performed by: Doug Pek and Eric Justa

Calibration gases used:

MAP stock #	Constituent	low- or mid-	Cylinder#	Exp date	Certified concentration	Units
76-188-232	NO	low	CC320264	01/08/12	128	ppm
76-188-232	CO	low	CC320264	01/08/12	125	ppm
76-188-219	O2	low	EB0006752	12/14/13	5.37	%
76-188-231	NO	mid	EB0016581	03/31/12	275	ppm
76-188-231	CO	mid	EB0016581	03/31/12	273	ppm
76-188-215	O2	mid	SA14533	04/25/11	9.13	%

Low-level CGA:

Start time	End time	NO	CO	O2
10:06	10:19	127	124	5.49
10:19	10:31	126.6	124	5.49
10:31	10:43	127	124	5.49
Ave	rage	126.9	124	5.49
Cal ga	s value	128.0	125	5.37
CGA accuracy		0.9%	0.8%	2.2%

High-level CGA:

Start time	End time	NO	CO	02
10:45	10:57	274	273	8.96
10:57	11:10	274.5	273	8.95
11:10	11:22	274	273	8.96
Ave	rage	274.2	273	8.96
Cal gas value		275.0	273	9.13
CGA ad	ccuracy	0.3%	0.1%	1.9%

Analyzer: Crude and Vacuum Heater NOx

Analyzer Manufacturer: ABB

Analyzer model #'s: Limas11 (NOx) and Magnos 106 (O2)

Constituents monitored (w/ranges): NOx (0-100) O2 (0-10%)

Date CGA performed: 1/7/2011

Performed by: Eric Justa and Doug Pek

Calibration gases used:

					Certified	
MAP stock #	Constituent	low- or mid-	Cylinder#	Exp date	concentration	Units
76-188-132	NO	low	EB0014050	03/10/11	25.3	ppm
76-188-219	O2	low	EB0007016	10/22/13	5.50	%
76-188-132	NO	mid	EB0025229	12/28/12	52.2	ppm
76-188-215	O2	mid	CC28352	01/09/12	9.02	%

Low-level CGA:

Start time	End time	NO	O2
9:03	9:15	25.4	5.49
9:15	9:27	25.4	5.49
9:27	9:40	25.4	5.49
Ave	Average		5.49
Cal ga	Cal gas value		5.50
CGA a	ccuracy	0.40%	0.18%

End time	NO	O2
9:56	51.5	8.92
10:08	51.5	8.92
10:21	51.5	8.92
е	51.5	8.92
Cal gas value		9.02
racy	1.34%	1.11%
	9:56 10:08 10:21 e alue	9:56 51.5 10:08 51.5 10:21 51.5 e 51.5 alue 52.2

Analyzer: CCR Charge Heater

Analyzer Manufacturer: ABB

Analyzer model #'s: URAS 14 (CO) and Magnos 106 (O2)

Constituents monitored (w/ranges): CO (0-500) and O2 (0-10%)

Date CGA performed: 3/22/2011

Performed by: Doug Pek and Eric Justa

Calibration gases used:

		low- or			Certified	
MAP stock #	Constituent	mid-	Cylinder #	Exp date	concentration	Units
76-188-166	CO	low	EB0004205	09/01/12	125	ppm
76-188-166	O2	low	EB0004205	09/01/12	4.98	%
76-188-165	CO	mid	EB0022817	01/04/14	272	ppm
76-188-165	O2	mid	EB0022817	01/04/14	8.98	%

Low-level CGA:

Start time	End time	co	O2
12:14	12:24	123	5.02
12:24	12:33	123	5.02
12:33	12:42	123	5.02
Ave	rage	123	5.02
Cal gas value		125.0	4.98
CGA ad	ccuracy	1.6%	0.8%

Start time	End time	CO	O2
12:42	12:51	269	8.98
12:51	13:00	269	8.98
13:00	13:09	269	8.98
Ave	rage	269	8.98
Cal ga	s value	272	8.98
CGA a	ccuracy	1.1%	0.0%

Analyzer: SRU Thermal Oxidizer SO2

Analyzer Manufacturer: ABB Advance Optima

Analyzer model #'s: LIMAS-11-UV (SO2) and MAGNOS 106/206 (O2)

Constituents monitored (w/ranges): SO2 (0-500) O2 (0-10%)

Date CGA performed:

3/30/2011

Performed by: Theo Taylor and Glen Senczyszyn

Calibration gases used:

					Certified	
MAP stock #	Constituent	low- or mid-	Cylinder#	Exp date	concentration	Units
76-188-232	SO2	low	EB0027779	01/31/13	129.0	ppm
76-188-219	O2	low	EB0027779	01/31/13	5.50	%
76-188-231	SO2	mid	CC316237	01/31/13	279	ppm
76-188-215	O2	mid	CC316237	01/31/13	9.01	%

Low-level CGA:

Start time	End time	SO2	O2
18:24	18:33	129.1	5.53
18:33	18:42	129.2	5.53
18:42	18:51	128.9	5.53
Ave	erage	129.1	5.53
Cal ga	is value	129	5.5
CGA a	ccuracy	0.1%	0.5%

Mid-level CGA:

Start time	End time	SO2	O2
18:51	19:01	277.7	9.02
19:01	19:10	277.4	9.02
19:10	19:20	276.1	9.02
Ave	Average		9.02
Cal ga	Cal gas value		9.0
CGA ad	ccuracy	0.7%	0.1%

CGA_IncinSO2.xlsx 4/6/2011

Analyzer: East Plant Fuel Gas

Analyzer: West Plant Fuel Gas

Analyzer Manufacturer: ABB

Analyzer Manufacturer: ABB

Analyzer model #'s: 2000 VISTA II

Analyzer model #'s: 2000GC

Constituents monitored

(w/ranges): H2S (0-300)

Constituents monitored

(w/ranges): H2S (0-300)

Date CGA performed:

N/A*

Date CGA performed:

1/25/2011

Performed by:

N/A*

Performed by: Eric Justa and Doug Pek

Calibration gases used:

MAP stock #	Constituent	low- or mid-	Cylinder#	Exp date	Certified concentration	Units
76-188-017	H2S	low	CC300341	01/27/11	74.5	ppm
76-188-019	H2S	mid	EB0024602	11/09/11	162	ppm

East Plant Fuel Gas

West Plant Fuel Gas

Low-level CGA:

Start time	End time	H2S		
Avei	age			
Cal gas	Cal gas value			
CGA ad	CGA accuracy			

Low-level CGA:

Start time	End time	H2S	
9:53	9:58	77.9	
9:58	10:01	78.0	
10:01	10:05	78.1	
Av	78.0		
Cal g	74.5		
CGA	CGA accuracy		

Mid-level CGA:

Start time	End time	H2S
·		
Ave		
Cal ga		
CGA a	ccuracy	

Start time	End time	H2S	
10:08	10:13	169	
10:13	10:17	170	
10:17	10:21	170	
Av	169		
Cal g	162		
CGA	CGA accuracy		

^{*} A Relative Accuracy Test Audit (RATA) was conducted on this CEMS 1/18/2011.

Analyzer: FCC Charge Heater

Analyzer Manufacturer: ABB

Analyzer model #'s: URAS 14 (CO) and Magnos 106 (O2)

Constituents monitored (w/ranges): CO (0-500) and O2 (0-10%)

Date CGA performed: 2/27/2011

Performed by: Doug Pek and Eric Justa

Calibration gases used:

		low- or			Certified	
MAP stock #	Constituent	mid-	Cylinder#	Exp date	concentration	Units
76-188-166	CO	low	CC275870	03/20/12	124	ppm
76-188-166	O2	low	CC275870	03/20/12	5.08	%
76-188-165	CO	mid	EB0006722	04/30/13	276	ppm
76-188-165	O2	mid	EB0006722	04/30/13	9.00	%

Low-level CGA:

Start time	End time	CO	O2
12:37	12:46	124	5.10
12:46	12:55	124	5.10
12:55	13:04	124	5.10
Ave	erage	124	5.10
Cal ga	as value	124	5.08
CGA a	iccuracy	0.0%	0.4%

Start time	End time	CO	O2
13:04	13:14	276	9.01
13:14	13:23	276	9.01
13:23	13:32	276	9.01
Average		276	9.01
Cal gas value		276	9.00
CGA a	ccuracy	0.0%	0.1%

Analyzer: Zurn Boiler NOx and O2

Analyzer Manufacturer: Horiba (NOx) and Yokagowa (O2)

Analyzer model #'s: ENDA-1120 (NOx) and ZA8 (O2)

Constituents monitored (w/ranges): NOx (0-500) O2 (0-10%)

Calibration gases used:

		low- or			Certified	
MAP stock #	Constituent	mid-	Cylinder#	Exp date	concentration	Units
76-188-232	NO	low	CC320264	01/08/12	128	ppm
76-188-219	02	low	109-06-03330	05/27/12	2.00	%
76-188-231	NO	mid	EB0009809	08/13/11	268	ppm
76-188-215	02	mid	MA116181	01/20/14	8.00	%

NOx Analyzer

Date CGA performed: 2/15/2011

Performed by: Theo Taylor and Eric Justa

Low-level CGA:

Start time	End time	NO	
12:40	12:46	128	
12:46	12:52	126	
12:52	12:58	126	
Avera	Average		
Cal gas	128.0		
CGA acc	CGA accuracy		

Mid-level CGA:

Start time	End time	NO	
13:00	13:06	266	
13:06	13:12	266	
13:12	13:18	266	
Avera	Average		
Cal gas	Cal gas value		
CGA acc	curacy	0.7%	

O2 Analyzer

Date CGA performed: 2/15/2011

Performed by: Theo Taylor and Eric Justa

Low-level CGA:

Start time	End time	O2	
10:34	10:38	1.8	
10:38	10:42	1.9	
10:42	10:46	1.9	
Aver	Average		
Cal gas	Cal gas value		
CGA ac	curacy	6.7%	

Start time	End time	O2
10:46	10:50	7.95
10:50	10:54	8.00
10:54	10:58	8.00
Aver	Average	
Cal gas	Cal gas value	
CGA ac	CGA accuracy	